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6 **UNITED STATES DISTRICT COURT**  
7 **FOR THE DISTRICT OF ARIZONA**

8 PAULA C. LORONA,

9 PLAINTIFF,

10 VS.

11 ARIZONA SUMMIT LAW SCHOOL LLC, A  
12 DELAWARE LIMITED LIABILITY  
13 COMPANY; INFILAW CORPORATION, A  
14 DELAWARE CORPORATION; JANE AND  
15 JOHNS DOE 1-100; BLACK CORPORATION 1-  
16 100; WHITE PARTNERSHIP 1-100,

DEFENDANTS,

**CASE No.: 2:15-CV-00972-NVW**

**NOTICE OF RULE 30(b)(6)  
DEPOSITION OF ARIZONA SUMMIT  
LAW SCHOOL**

(ASSIGNED TO THE HONORABLE NEIL V.  
WAKE)

17 NOTICE IS HEREBY GIVEN that, pursuant to Rule 30(b)(6), Fed. R. Civ. P., the  
18 Plaintiff, Paula C. Lorona, by and through undersigned counsel, shall take the deposition  
19 upon oral examination of Arizona Summit Law School ("ASLS") through one or more  
20 officers, directors, agents, or other representatives who shall be designated to testify on  
21 ASLS' behalf regarding all information known or reasonably available to ASLS with respect  
22 to the matters listed in Exhibit A. Plaintiff requests that ASLS provide written notice at least  
23 five (5) business days before the deposition of the name(s) and employment position(s) of  
24 the individual(s) designated to testify on ASLS' behalf.  
25

1 The deposition shall commence on July 8, 2016 at 10:00 a.m., at the offices of Mills +  
2 Woods Law, PLLC, 5055 N. 12<sup>th</sup> St., Suite 101, Phoenix, Arizona, 85014 and shall be taken  
3 before a duly certified court reporter authorized to administer oaths. The deposition will be  
4 recorded by stenographic means.

5  
6 **RESPECTFULLY SUBMITTED** this 26th day of May 2016.

7  
8 **MILLS + WOODS LAW PLLC**

9 By /s/ Robert T. Mills

10 Robert T. Mills

11 Sean A. Woods

12 5055 North 12th Street, Suite 101

13 Phoenix, AZ 85014

14 *Attorneys for Plaintiff*

**EXHIBIT A**

In accordance with Rule 30(b)(6), FRCP, Plaintiff designates the matters identified below for examination. In construing these topics, the following instructions and definitions shall apply:

1. All terms shall be construed to encompass as broad a range of information as permitted under the Federal Rules of Civil Procedure.
2. The term “ABA” means the American Bar Association.
3. The term “ASLS” means Arizona Summit Law School.
4. The terms “Bar Exam Predictor Formula” or “Formula” means ASLS’ or Infilaw’s internal predictor formula generated by ASLS’ or Infilaw’s employees that depicts an individual student’s percentage chance of passing a bar examination.
5. The terms “LSAC” or “Law School Admission Council” means a nonprofit corporation that provides unique, state-of-the-art products and services to ease the admission process for law schools and their applicants worldwide. Currently, 222 law schools in the United States, Canada, and Australia are members of the Council and benefit from LSAC’s services.
6. The term “Ultimate Bar Pass Rate” means ASLS’ formula for determining the percentage of which all ASLS graduates eventually pass the Arizona bar examination.
7. The terms “UP” or “Unlock Potential” Program means ASLS’ bar exam deferral program paying students stipends to extend their bar preparation from a usual 10-week program to a four-month or longer program causing students to defer taking the bar exam from the first exam offered after graduation to subsequent offerings.

**The Deponent Shall Be Prepared To Address The Following Topics:**

1. ASLS' Bar Exam Predictor Formula
  - a. Development of the Formula
    - i. Statistics used in calculating the Formula
    - ii. Variables used in calculating the Formula
  - b. Implementation of the Formula
    - i. Formula as applied to Applicants
    - ii. Formula as applied to First-Year students
    - iii. Formula as applied to Second-Year students
    - iv. Formula as applied to Third-Year students
    - v. Formula as applied to Graduates
2. ASLS' Ultimate Bar Pass Rate
  - a. Development of the Ultimate Bar Pass Rate
    - i. Statistics used in calculating the Ultimate Bar Pass Rate
    - ii. Variables used in calculating the Ultimate Bar Pass Rate
  - b. Implementation of the Ultimate Bar Pass Rate
    - i. Marketing of the Ultimate Bar Pass Rate
3. ASLS' Unlock Potential Program
  - a. Development of the Program
  - b. Determination of student or graduate eligibility for the Program
4. ASLS' AAMPLE Program
  - a. Development of the AAMPLE Program
  - b. Determination of AAMPLE Program eligibility for prospective students
  - c. Determination of acceptance criteria for prospective students
  - d. Maintenance of AAMPLE student records
5. ASLS' standards and procedures for compliance with LSAC Reporting Requirements
6. ASLS' standards and procedures for compliance with ABA Reporting Requirements
7. ASLS' Compliance with ABA law school admission rules and standards
8. ASLS' program(s) for admissions of students through Non-traditional Methods
  - a. The origin and rationale for the admission of students through Non-traditional Methods
  - b. The number of students who were admitted through Non-traditional Methods for each of the years 2005 through 2015.
  - c. The percentage of ASLS students who were admitted to ASLS through Non-traditional Methods for each of the years 2005 through 2015

- d. The number and percentage of ASLS students who were admitted to ASLS through Non-traditional Methods who were graduated from ASLS for each of the years 2005 through 2015
- e. The total number number of ASLS students for each of the years 2005 through 2015
- f. The number of ASLS graduates who were admitted to ASLS through Non-traditional Methods and who took the Arizona bar examination for each of the years 2005 through 2015
- g. The number of ASLS graduates who were admitted to ASLS through Non-traditional Methods and who passed the Arizona bar examination for each of the years 2005 through 2015
- h. The number of ASLS graduates who were admitted to ASLS through Non-traditional Methods and who took a bar examination in a jurisdiction other than Arizona for each of the years 2005 through 2015
- i. The number of ASLS graduates who were admitted to ASLS through Non-traditional Methods and who passed a bar examination in a jurisdiction other than Arizona for each of the years 2005 through 2015

**CERTIFICATE OF SERVICE**

I hereby certify that on May 26, 2016, I electronically transmitted the foregoing document to the Clerk's Office using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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